

b(5)

[REDACTED]

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Age Group	Should Take Action (%)	Should Not Take Action (%)
18-29	85	15
30-49	80	20
50-69	75	25
70+	70	30

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
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b(5)

[REDACTED]

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[REDACTED]

From: Elliott, Frank [<mailto:Frank.Elliott@bp.com>]
Sent: Wednesday, February 18, 2015 10:07 AM
To: Chen, Isaac
Subject: Non-aqueous Based Drill Cutting R.O.C. Question

Dear Isaac,

I was wondering if you could answer a permit question regarding retention on cuttings when using non-aqueous mud?

We have a well plug and abandon activity that is soon to take place.

Well details:

Company A drilled and complied with R.O.C. permit requirements of <6.9%

Company B now is plugging and abandoning the well and will need to take a Small Volume Discharge and will claim the permit default of 25% R.O.C.

Question:

Can another operator performing the P&A use previous well drilling Retention on Cutting (R.O.C.) data when claiming a Small Volume Discharge? Thus, Can Operator B (operator performing the P&A) use Company A's (company who drilled, completed, etc. the well) historic R.O.C. values when claiming the Small Volume Discharge default of 25% R.O.C. to determine permit compliance?

Does Company B (P&A Operator) even need to monitor for R.O.C. since there is no added well depth?

I located the attached file where OOC and EPA Region 6 held a Synthetic Based Mud Q&A Session in March 2002 (see below quote and attached file). The only information that even comes close to using the original well data is a question pertaining to a sidetrack that is greater than the original well.

Page 3 of the attached file states the following:

13 ROC/BMP I am using the BMP option, and I want to drill a geological sidetrack to a new sub-surface

target after I have discontinued ROC monitoring. Must I resume ROC monitoring?

No, provided the sidetrack is not deeper than the original well's PLANNED depth. If the sidetrack has a greater measured depth, you will have to resume ROC monitoring until at least 1 / 3 of the SBM interval has been monitored. In this case, the additional ROC monitoring can be additive to the monitoring for the original well.

Many thanks for your time and guidance in the above question. Perhaps this could be addressed in the next permit revision?

Have a great day.

Frank